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February 16, 2022

VIA ECF

Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

**Re: Letter Motion to Redact Social Security Numbers Included in Exhibit B to
Defendant's Motion to Dismiss in *Champlin v. Music Sales Corporation et.al.*, Civil
Action No. 21-cv-07688-PAE**

Dear Judge Engelmayer:

We represent Defendants Music Sales Corporation d/b/a Wise Music ("MSC") and Wise Music Group, Ltd. in this action. On December 13, 2021 the undersigned filed a motion to dismiss Plaintiff's First Amended Complaint, entered as ECF NO. 20. It has recently been brought to Defendants' attention that the last page of Exhibit B to the Caplan Affirmation, submitted in support of the motion to dismiss, contains three social security numbers which should have been redacted at the time of filing.

Immediately upon being notified of the unredacted Social Security numbers, the undersigned reached out to the ECF Help desk to request that Exhibit B to the Caplan Affirmation be sealed. We have been informed that the ECF Help Desk has in fact now sealed Exhibit B to the Caplan Affirmation and we have been further instructed to file the within letter motion to ensure that Exhibit B remains sealed. The undersigned was also directed to submit a redacted version of Exhibit B to the Caplan Affirmation. A properly redacted version of Exhibit B to the Caplan Affirmation is annexed as Exhibit 1 to the within letter motion.

Please be advised that the only information redacted from Exhibit B to the Caplan Affirmation pertains to the Social Security numbers found on page 6 of Exhibit B. These redactions are made in accordance with F.R.C.P. Section 5.2 and in compliance with Judge Engelmayer's Individual Rules and Practices, Section 4(B).

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All other exhibits to the motion remain unaffected and Defendants' motion to dismiss remains returnable on March 9, 2022. Should you have any questions, please do not hesitate to contact the undersigned.

Very truly yours,

/s/ *Madison A. Kucker*

Madison A. Kucker

cc. ECF counsel of record

The Court thanks counsel for these submissions. The social security numbers specified herein shall henceforth be redacted. SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

Dated: February 17, 2022